

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
DOCKET NO. R97-1

**SEVENTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO THE UNITED STATES POSTAL SERVICE
(UPS/USPS-27 through UPS/USPS-35)**

(September 17, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service (UPS/USPS-27 through UPS/USPS-35).

Respectfully submitted,



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Of Counsel.

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO THE UNITED STATES POSTAL SERVICE**

UPS/USPS-27. Please explain whether and in what manner IOCS and other Postal Service Data Collectors will perform data collection in the Priority Mail facilities operated pursuant to the PMPC contract.

UPS/USPS-28. Please explain what data will be collected by the Postal Service or other personnel regarding the quantity, shape, item/container type, or other mail characteristics for mail handled at facilities operated pursuant to the PMPC contract.

UPS/USPS-29. Please explain what data will be collected by the Postal Service or other personnel that will be available or used for determining costs and rates for mail handled at facilities operated pursuant to the PMPC contract.

UPS/USPS-30. Please indicate whether the mail processing flow for Priority Mail at the Capital Beltway Facility is typical of the mail processing flow at analogous facilities. If the mail processing flow for Priority Mail at the Capital Beltway facility is other than typical, please indicate how it is atypical and what the typical mail processing flow(s) for Priority Mail processing are at similar facilities.

UPS/USPS-31. Please confirm that some quantity of Priority Mail is now handled in flat trays by the Postal Service. If not confirmed, please explain. If confirmed, please indicate why and by what process (e.g., manually, flat sorting machine, etc.) mail is placed into flat trays. Please also indicate whether the use of flat

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trays for Priority Mail is expected to increase or decline, and the reasons why their use is expected to change.

UPS/USPS-32. (a) Please indicate whether Priority Mail has been, or is currently processed on flat sorting machines.

(b) Please provide or estimate the volume or proportion of Priority Mail processed on flat sorting machines in the Base Year, Test Year, or any other year in which Priority Mail has been processed on flat sorting machines.

(c) Please identify the number and type of facilities at which Priority Mail has been processed, or is currently processed on flat sorting machines.

UPS/USPS-33. Please explain what a "HASP" facility is and how it fits into the Postal Service's mail processing and transportation network.

UPS/USPS-34. Please refer to your response to UPS/USPS-14(b). Please indicate whether the PERMIT system collects data for all Priority Mail volume, or for a subset of Priority Mail volume. If the answer is anything other than all Priority Mail volume, please indicate what determines whether the PERMIT system will record data regarding Priority Mail.

UPS/USPS-35. Please refer to your response to UPS/USPS-14(b). Please indicate whether the ODIS system collects data for all Priority Mail volume, or for a subset of Priority Mail volume. If the answer is anything other than all Priority Mail

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volume, please indicate what determines whether the ODIS system will record data regarding Priority Mail.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.



Stephanie Richman

Dated: September 17, 1997
Philadelphia, PA